

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

BRUSSELS • FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

February 17, 2021

Via ECF

The Honorable Loretta A. Preska,
United States District for the Southern District of New York,
500 Pearl Street,
New York, NY 10007.

Re: *Petersen Energía Inversora S.A.U., et al. v. Argentine Republic and YPF S.A.*, No. 15 Civ. 2739 (LAP) (“*Petersen*”); *Eton Park Cap. Mgmt. et al. v. Argentine Republic and YPF S.A.*, No. 16 Civ. 8569 (LAP) (“*Eton Park*”)

Dear Judge Preska:

Pursuant to Local Rule 5.2, Rule 2(H) of the Individual Practices of this Court, and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in this action (*Petersen* ECF No. 177; *Eton Park* ECF No. 124) (the “Protective Order”), Defendant the Argentine Republic (“the Republic”), together with Defendant YPF S.A. (“YPF”), which joins in this letter, respectfully move for an order granting leave to file under seal Defendants’ enclosed February 17, 2021 Report Regarding Status of Discovery and Response to Plaintiffs’ February 11, 2021 Pre-Motion Conference Submission and Exhibits 15 and 18 thereto (the “Exhibits”).

The Exhibits are an October 30, 2020 letter from Damaris Hernández, which references the October 29 deposition of Burford Capital CEO Christopher Bogart that Plaintiffs have designated as confidential under the Protective Order, and excerpts of the October 30, 2020 deposition of the Republic’s 30(b)(6) witness, María Alejandra Etchegorry, that the Republic has designated as confidential under the Protective Order. The Republic and YPF seek leave to file the excerpted transcript under seal and to redact portions of the publicly-accessible letter and Report that quote from the transcripts in light of Plaintiffs’ and the Republic’s designations.

Respectfully,

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.

cc: Counsel of Record

The sealing request is granted. SO ORDERED.

Loretta A. Preska 2/18/2021